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6 Attorneys for Defendant THE BOARD
7 OF TRUSTEES OF THE LELAND
STANFORD JUNIOR UNIVERSITY

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA

10 SAN JOSE DIVISION

12 JANE DOE,

Civil Action No. 3:16-cv-06973-EJD

13 Plaintiff,

14 v.

15 STANFORD UNIVERSITY,

16 Defendant.

**DECLARATION OF SARAH G.
FLANAGAN IN SUPPORT OF
DEFENDANT'S STATEMENT OF
NON-OPPOSITION**

Date: March 16, 2017

Time: 9:00 a.m.

Dept: Courtroom 4, 5th Floor

Judge: Hon. Edward J. Davila

21
22 I, Sarah G. Flanagan, declare as follows:

23 1. I am a member of the State Bar of California and of the law firm Pillsbury
24 Winthrop Shaw Pittman LLP. I am lead counsel for Defendant THE BOARD OF TRUSTEES
25 OF THE LELAND STANFORD JUNIOR UNIVERSITY ("Stanford") in the above-captioned
26 matter.

27 2. I submit this declaration in support of Stanford's Statement of Non-Opposition to
28 the Motion for Leave To Proceed Using Pseudonym filed by Plaintiff Jane Doe ("Plaintiff") on

1 December 15, 2016 (the “Motion”). I have personal knowledge of the facts stated herein and, if
2 called as a witness, I could and would competently testify hereto.

3. Plaintiff's counsel, John Clune, and I spoke on December 12, 2016, about
Plaintiff's planned motion to be allowed to proceed using a pseudonym in this lawsuit. I said
that Plaintiff would have to otherwise conduct herself during the litigation in accord with her
request for privacy and that Stanford would want all of the Stanford students, current and former,
who might be named in public filings to be given the same privacy consideration. I informed
Mr. Clune that I would check but that I believed that Stanford would not oppose the motion on
the conditions that Plaintiff will not make any public statements under either her real name or
pseudonym during the pendency of the matter and that all Stanford students or former students
will be similarly identified by pseudonym in any public filings. That same day Mr. Clune sent
me proposed language describing those conditions for use in the planned motion. Based on
Plaintiff's agreement to those conditions, Stanford agreed not to oppose the planned motion. On
December 14, 2016, Plaintiff, through her counsel Kimberly Hult, confirmed her agreement to
those conditions. I note that Plaintiff's agreement is also confirmed in footnote 1 of the Motion.

16 I declare under penalty of perjury under the laws of the State of California that the
17 foregoing is true and correct.

18 This declaration was executed this 29th day of December, 2016, at San Francisco,
19 California.

By: /s/ Sarah G. Flanagan
Sarah G. Flanagan